

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**JAMES DANIEL WILSON, JR.  
18686 HIGHWAY 21 EAST  
BRYAN, TEXAS 77808  
DEBTOR**

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**CASE NO. 21-33129  
CHAPTER 11**

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

TO ALL PARTIES, please take notice that:

COMES NOW Gregory A. Fraser, of Gregory A. Fraser, P.C., and files this his Notice of Appearance and Request for Notices as counsel for Flowers Davis, P.L.L.C. (“Flowers Davis”), in the above-referenced matter and, pursuant to Bankruptcy Rules 2002, 3017, 9010, and 2017, respectfully requests that all notices given or required to be given in these proceedings and all papers served or required to be served in these proceedings be served upon the undersigned at the office, postal address, and telephone number listed below.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to 11 U.S.C. §1109(b), the foregoing request includes notices and papers referred to in the Bankruptcy Rules and additionally includes, without limitation, notices of any application, complaint, demand, hearing, motion, pleading or request, formal or informal, whether transmitted or conveyed by mail, telephone or otherwise. Further, Flowers Davis requests that it be provided with a copy of all schedules, statements of financial affairs, any plan and disclosure statement, Motion for Confirmation or Motion for Discharge filed herein.

PLEASE TAKE FURTHER NOTICE that Flowers Davis intends that neither this Notice nor

any later appearance, pleading, claim or suit shall waive: (a) Flowers Davis's right to have final orders in non-core matters entered only after de novo review by a District Court; (b) Flowers Davis's right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (c) Flowers Davis's rights to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) any other rights, claims, actions, defenses, set-offs or recoupments to which Flowers Davis is or may be entitled.

Respectfully submitted,

**GREGORY A. FRASER, P.C.,**

*/s/ Gregory A. Fraser*

Gregory A. Fraser  
State Bar No. 07393525

P.O. Box 2562  
209 S. Main Street  
Lindale, Texas 75771  
(903) 881-9557 - telephone  
(903) 881-8829 - facsimile  
[gaf@fraserlaw.org](mailto:gaf@fraserlaw.org) - e-mail

ATTORNEY FOR FLOWER DAVIS, P.L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served electronically or via 1st class mail, postage prepaid, to the following on this the 19<sup>th</sup> day of October, 2021.

James Daniel Wilson, Jr.  
18686 Highway 21 East  
Bryan, Texas 77808

Reese Baker  
950 Echo Lane, Ste. 300  
Houston, Texas 77024

Allison D. Byman  
7924 Broadway, Ste. 104  
Pearland, Texas 77581

Ha Minh Nguyen  
515 Rusk Street, Ste. 3516  
Houston, Texas 77002

Scott A. Richeson  
Ritcheson, Lauffer & Vincent, P.C.  
821 ESE Loop 323, Suite 530  
Tyler, Texas 75701

/s/ Gregory A. Fraser

Gregory A. Fraser